

# EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

DENNIS GROMOV, individually )  
and on behalf of all others )  
similarly situated, )  
 )  
Plaintiff, ) Case No. 1:22-cv-06918  
 )  
vs. )  
 )  
BELKIN INTERNATIONAL, INC., )  
 )  
Defendant. )

The videotaped deposition of DENNIS GROMOV,  
called by the Defendant for examination taken  
pursuant to the Federal Rules of Civil Procedure of  
the United States District Courts pertaining to the  
taking of depositions, taken before Valerie  
Calabria, CSR, RPR, taken at 5550 North River Road,  
Rosemont, Illinois, on November 8, 2023, at  
9:58 a.m.

1 APPEARANCES:

2 LEVIN, PAPANTONIO, RAFFERTY, PROCTOR, BUCHANAN,  
3 O'BRIEN, BARR & MOUGEY, P.A.

4 BY: MR. WILLIAM F. CASH, III  
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9 appeared on behalf of the Plaintiff;

10 BAKER MCKENZIE LLP

11 BY: MS. NANCY NGUYEN SIMS  
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16 BAKER MCKENZIE LLP

17 BY: MS. KATELYN VanDOORNE  
18 300 East Randolph Street, Suite 5000  
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20 312.861.8000  
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22 appeared on behalf of the Defendant.

23 ALSO PRESENT:

24 Barbara Patel, videographer

\* \* \* \* \*

Reported By: Valerie M. Calabria, CSR, RPR  
License No.: 084-003928

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WITNESS

EXAMINATION

DENNIS GROMOV

BY MS. SIMS

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## DEPOSITION EXHIBITS

NUMBER/DESCRIPTION

IDENTIFIED

Gromov Deposition Exhibit

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1           THE VIDEOGRAPHER: Good morning. We are going  
2 on the video record at 9:58 a.m. on November 8th,  
3 2023. Please note that the microphones are  
4 sensitive and may pick up whispering and private  
5 conversations. Please mute your phones at this  
6 time. Audio and video recording will continue to  
7 take place unless all parties agree to go off  
8 record.

9                       This is Media Unit 1 of the  
10 video-recorded deposition of Dennis Gromov taken by  
11 the counsel for the defendant in the matter of  
12 Dennis Gromov, individually and on behalf of all  
13 others similarly situated, vs. Belkin  
14 International, Inc., filed in the United States  
15 District Court for the Northern District of  
16 Illinois, Case No. 1:22-cv-06918.

17                      The location of the deposition is  
18 Hilton Rosemont at 5550 North River Road in  
19 Rosemont, Illinois. My name is Barbara Patel  
20 representing Veritext, and I am the videographer.  
21 The court reporter is Valerie Calabria from  
22 Veritext. I am not authorized to administer an  
23 oath, I am not related to any party in this action,  
24 nor am I financially interested in the outcome.

1                   If there are any objections to the  
2       proceedings, please state them at the time of your  
3       appearance. Counsel, all present, and everyone,  
4       including people attending remotely, will now state  
5       their appearances and affiliations for the record,  
6       beginning with the noticing attorney first.

7           MS. SIMS: Nancy Sims from Baker McKenzie on  
8       behalf of Belkin International.

9           MS. VanDOORNE: Katelyn VanDoorne from Baker  
10      McKenzie also on behalf of Belkin International.

11          MR. CASH: I'm Bill Cash representing  
12      Mr. Gromov.

13                   (Witness duly sworn.)

14                   DENNIS GROMOV,  
15      called as a witness herein, having been first duly  
16      sworn, was examined and testified as follows:

17                   EXAMINATION

18      BY MS. SIMS:

19           Q.      Hi, Mr. Gromov. Good morning.

20           A.      Hi.

21           Q.      Thank you for being here today. Can you  
22      please state and spell your name for the record.

23           A.      Yeah. Dennis Gromov, D-e-n-n-i-s,  
24      G-r-o-m-o-v.

1       were in school?

2               A.       Yes.

3               Q.       Do you have any hobbies that involve  
4       electronics?

5               A.       Like sports or like --

6               Q.       You know, in any capacity.

7               A.       Not really.

8               Q.       Have you ever taken any courses on  
9       electronics, like outside of school, like, you  
10      know, like the Apple Store will offer classes or  
11      community college, anything like that?

12              A.       No.

13              Q.       Are you involved in any special interest  
14      groups related to electronics, like any clubs?

15              A.       No.

16              Q.       What kind of a cell phone, mobile phone,  
17      do you have now?

18              A.       I have the Samsung Galaxy Note 20 Ultra.

19              Q.       Is this the same phone that you had when  
20      you purchased the battery pack that's at issue in  
21      this lawsuit?

22              A.       No.

23              Q.       What was the phone that you had at that  
24      time?

1           A.     It was a Samsung Galaxy S6 edge.

2           Q.     When did you get the Note 20 Ultra?

3           A.     I want to say, a rough estimate, maybe  
4 around 2021, I'd say. I'm not -- yeah. Yeah.

5           Q.     That's okay. So approximately 2021; is  
6 that fair?

7           A.     It was either 2020 or 2021. I don't  
8 remember exact just because it was, like, after the  
9 pandemic, my timeline during the, like, actual  
10 pandemic, just sitting inside all the time, time  
11 flew by really fast.

12          Q.     I think that's the case for everybody.

13          A.     Yeah.

14          Q.     I don't think you're alone in that.

15 Okay. Fair enough. So 2020 or 2021?

16          A.     Yes.

17          Q.     Okay. Immediately before you got the  
18 Note 20, were you still using the S6 edge?

19          A.     Yes.

20          Q.     Have you ever -- did you ever use the  
21 Belkin power -- Belkin battery pack that's at  
22 issue? And we'll get into talking about that in a  
23 little bit. Did you ever use that battery pack to  
24 charge the Note 20 Ultra?



1           A.       Initially I was, but then -- and I don't  
2       know if it's, like, the wiring or what, but it just  
3       kind of stopped charging, like, everything.

4           Q.       So it just stopped working. How long  
5       after you got it?

6           A.       I want to say just, like, a couple  
7       months. I don't have an exact time frame, but a  
8       couple months.

9           Q.       And how long after -- I believe you  
10      previously testified that the Goal Zero does not  
11      work with your current mobile phone, right?

12          A.       Mm-hmm.

13          Q.       Is that correct?

14          A.       That's correct.

15          Q.       So how long after you bought the Goal  
16      Zero did you get your new cell phone?

17          A.       When did I get my new cell phone? I  
18      think that was -- it was getting cold. Maybe  
19      around 2021. Maybe like sometime in 2021 near,  
20      like, the second half of the year because I do  
21      remember it was a little chillier out. So...

22          Q.       Okay. So would it be fair to say, then,  
23      it was like over a year after you bought the Goal  
24      Zero and the Belkin Pocket Power? And, again, not

1     trying to trick you; just trying --

2             A.     Yeah.

3             Q.     -- to get the timeline right.

4             A.     Or maybe it was early in the year.

5     Because it was, like, cold. Maybe -- after I got

6     that, I want to say maybe, like -- it could be in

7     the range of like three to six months after I had

8     the Goal Zero. So I think it was like start of

9     2021. Because I do remember it being a little

10    chilly out, so I walked in with a jacket to buy it.

11    It was -- I think I got it at T-Mobile. It's right

12    next to Qdoba in Vernon Hills. I think it's a

13    T-Mobile. But...

14            Q.     Okay. So by the time you got your  
15    current cell phone, the Note, the Goal Zero was  
16    already broken?

17            A.     Yes.

18            Q.     Okay. So you weren't using it, anyway,  
19    by the time you got your new phone?

20            A.     No.

21            Q.     Okay. And do you have any type of a  
22    battery pack that you're using for your current  
23    phone?

24            A.     No.

1 STATE OF ILLINOIS )  
 ) SS:

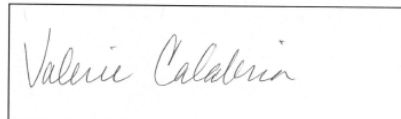
2 COUNTY OF COOK )

3 I, Valerie M. Calabria, CSR, RPR, do hereby  
4 certify that DENNIS GROMOV was duly sworn by me to  
5 testify the whole truth, and that the foregoing  
6 deposition was recorded stenographically by me and  
7 was reduced to computerized transcript under my  
8 direction, and that the said deposition constitutes  
9 a true record of the testimony given by said  
10 witness.

11 I further certify that the reading and  
12 signing of the deposition was not waived, and that  
13 the deposition was submitted to Mr. William F.  
14 Cash, III, plaintiff's counsel, for signature.  
15 Pursuant to Rule 30(e) of the Federal Rules of  
16 Procedure, if deponent does not appear or read and  
17 sign the deposition within 30 days, the deposition  
18 may be used as fully as though signed, and this  
19 certificate will then evidence such failure to  
20 appear as the reason for signature not being  
21 obtained.

22 I further certify that I am not a relative or  
23 employee or attorney or counsel of any of the  
24 parties, or a relative or employee of such attorney  
or counsel, or financially interested directly or  
indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my  
hand this 22nd day of November, A.D. 2023.



Valerie M. Calabria, CSR, RPR  
Illinois CSR License 084-003928